

LAW OFFICES OF
NASH & KIRCHNER, P.C.

P.O. BOX 2310
TUCSON, ARIZONA 85702
Telephone (520) 792-1613
Fax (520) 628-1079
Pima County Computer No. 41636
State Bar No. 002893
walter.nash@azbar.org
bkirchner@azbar.org

Attorney for defendant David Reid

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

CR-05-1849 JH

vs.

DAVID REID,

Defendant.

**SECOND MOTION FOR MODIFICATION OF CONDITIONS
OF RELEASE (UNOPPOSED)**

The defendant David Reid, by his counsel undersigned, hereby moves this Court for an Order modifying his conditions of release (travel restrictions only). Counsel undersigned has reviewed this matter with

1 James Braun, the Assistant United States Attorney handling this matter.

2 Mr. Braun has no objection to the entry of this Order.

3 Personnel in the office of counsel undersigned have reviewed this
4 matter with PTS personnel in both Phoenix, Arizona and Santa Fe, New
5 Mexico. Mr. Reid has reviewed the details of the proposed modification
6 and the reason therefore with Dominnico Encinias of PTS in Santa Fe PTS
7 has no objection to this modification.

8 Mr. Reid's mother resides in Newberg, Oregon. She is very ill and is
9 not expected to live much longer. Mr. Reid would be traveling to visit her
10 whenever possible to help care for her and to help her get her affairs in
11 order.

12 Therefore, the Court is respectfully urged to allow Mr. Reid to be
13 allowed to travel to visit his mother in Newberg, Oregon, subject to advising
14 PTS as to where he will be going, when he will be leaving, and when he will
15 be returning, prior to commencing the trip.

16 No hearing is requested on this matter. A copy of this motion and the
17 proposed order are being provided to Dominnico Encinias (PTS, New
18 Mexico) and Claudette Thomas (PTS, Arizona).

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1 RESPECTFULLY SUBMITTED this 21st day of December, 2007.
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7 BY /s/ Walter Nash
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WALTER NASH

Attorney for Defendant Reid

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Telephone (520) 792-1613

1 CERTIFICATE OF SERVICE

2 I hereby certify that on this 21st day of December, 2007, I served a
3 true and correct copy of this Joinder by U.S. Mail, postage prepaid, on
4 counsel for the United States at the address listed below:

5 James R.W. Braun, Esq.
6 Assistant United States Attorney
7 P.O. Box 607
8 Albuquerque, New Mexico 87103

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10 /s/ Walter Nash

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